

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Beverly Rivera

(b) County of Residence of First Listed Plaintiff Philadelphia

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Law Offices of Robert T Vance Jr, 100 South Broad
Street, Suite 905, Philadelphia PA 19110 215 557 9550

DEFENDANTS

Commonwealth of Pennsylvania, Office of the Attorney

General

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander			<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Federal Employers' Liability			<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine			<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability			<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 350 Motor Vehicle			<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability			<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury			<input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice			<input type="checkbox"/> 485 Telephone Consumer Protection Act
<input type="checkbox"/> 195 Contract Product Liability				<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 196 Franchise				<input type="checkbox"/> 850 Securities/Commodities/Exchange
				<input type="checkbox"/> 890 Other Statutory Actions
				<input type="checkbox"/> 891 Agricultural Acts
				<input type="checkbox"/> 893 Environmental Matters
				<input type="checkbox"/> 895 Freedom of Information Act
				<input type="checkbox"/> 896 Arbitration
				<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
				<input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 USC Section 1981

VI. CAUSE OF ACTION

Brief description of cause:
Employment discrimination - race

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE n/a

DOCKET NUMBER

DATE February 5, 2023 SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

DESIGNATION FORM

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: Philadelphia, Pennsylvania
Address of Defendant: Philadelphia, Pennsylvania
Place of Accident, Incident or Transaction: Philadelphia, Pennsylvania

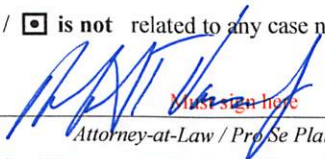
RELATED CASE, IF ANY:

Case Number: n/a Judge: _____ Date Terminated: _____

Civil cases are deemed related when **Yes** is answered to any of the following questions:

- | | | |
|--|------------------------------|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☒ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 02/05/2023  37692
Attorney-at-Law / Pro Se Plaintiff Attorney I.D. # (if applicable)

CIVIL: (Place a ☒ in one category only)

A. Federal Question Cases:

- | | |
|-------------------------------------|---|
| <input type="checkbox"/> | 1. Indemnity Contract, Marine Contract, and All Other Contracts |
| <input type="checkbox"/> | 2. FELA |
| <input type="checkbox"/> | 3. Jones Act-Personal Injury |
| <input type="checkbox"/> | 4. Antitrust |
| <input type="checkbox"/> | 5. Patent |
| <input type="checkbox"/> | 6. Labor-Management Relations |
| <input checked="" type="checkbox"/> | 7. Civil Rights |
| <input type="checkbox"/> | 8. Habeas Corpus |
| <input type="checkbox"/> | 9. Securities Act(s) Cases |
| <input type="checkbox"/> | 10. Social Security Review Cases |
| <input type="checkbox"/> | 11. All other Federal Question Cases |
- (Please specify): _____

B. Diversity Jurisdiction Cases:

- | | |
|--------------------------|--|
| <input type="checkbox"/> | 1. Insurance Contract and Other Contracts |
| <input type="checkbox"/> | 2. Airplane Personal Injury |
| <input type="checkbox"/> | 3. Assault, Defamation |
| <input type="checkbox"/> | 4. Marine Personal Injury |
| <input type="checkbox"/> | 5. Motor Vehicle Personal Injury |
| <input type="checkbox"/> | 6. Other Personal Injury (Please specify): _____ |
| <input type="checkbox"/> | 7. Products Liability |
| <input type="checkbox"/> | 8. Products Liability – Asbestos |
| <input type="checkbox"/> | 9. All other Diversity Cases |
- (Please specify): _____

ARBITRATION CERTIFICATION

(The effect of this certification is to remove the case from eligibility for arbitration.)

I, Robert T Vance Jr, counsel of record or pro se plaintiff, do hereby certify:

☒ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☒ Relief other than monetary damages is sought.

DATE: 02/05/2023  37692
Attorney-at-Law / Pro Se Plaintiff Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

United States District Court for the Eastern District of Pennsylvania

Beverly Rivera	:	
	:	
vs	:	Civil Action No.
	:	Jury Trial Demanded
Commonwealth of Pennsylvania, Office of	:	
the Attorney General	:	

Complaint

Plaintiff, Beverly Rivera, brings a series of claims against defendant, Commonwealth of Pennsylvania Office of the Attorney General, of which the following is a statement.

Jurisdiction and Venue

1. This Court has original jurisdiction to hear this Complaint and adjudicate the claims stated herein under 28 U.S.C. §§ 1331 and 1343, this action being brought under 42 U.S.C. § 1983 ("Section 1983"), the Civil Rights Act of 1866, 42 U.S.C. § 1981 ("Section 1981"), and the Civil Rights Act of 1991, Pub. L. 102-166, 105 Stat. 1071 (Nov. 21, 1991).

2. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b)(2), because a substantial part of the events or omissions giving rise to this case occurred in this judicial district.

3. Ms. Rivera timely filed a Charge of Discrimination with the U.S. Equal Employment Opportunity Commission alleging violations of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000d and 2000e et seq. ("Title VII") and the Pennsylvania Human Relations Act, 43 P.S. § 951 et seq. ("PHRA"). Upon receipt of the Notice of Right to

Sue from the EEOC, Ms. Rivera will amend this Complaint to include claims under Title VII and the PHRA.

The Parties

4. Plaintiff, Beverly Rivera, is a Puerto Rican female citizen of the United States and a resident of this judicial district.

5. Defendant, Commonwealth of Pennsylvania, Office of Attorney General, is an agency of the Commonwealth of Pennsylvania. Its principal place of business is located at 16th Floor, Strawberry Square, Harrisburg, Pennsylvania 17120.

6. At all times relevant to this action, defendant was an "employer" within the meaning of Section 1983, Section 1981 and applicable state law.

7. The acts set forth in this Complaint were authorized, ordered, condoned and/or done by defendant's officers, agents, employees and/or representatives while actively engaged in the management of defendant's business and pursuant to defendant's official policies and customs.

Background Facts

8. Plaintiff, Beverly Rivera, was employed by Defendant as a Narcotics Agent 1, Strategic Response Team, from August 12, 2019, until August 30, 2022, when her employment was terminated because of her race and gender, and as a result of the hostile work environment based on her race and gender defendant created, condoned and perpetuated.

9. On March 31, 2021, Defendant's Regional Director, Nehemiah Haigler, informed Ms. Rivera that she was being placed on paid administrative leave pending investigation. In connection with that action, Defendant required Ms. Rivera to return her Defendant-issued firearm, badge, identification/access card and vehicle. Defendant took this action against Ms.

Rivera because of her race and gender, and in furtherance of the creation and perpetuation of a hostile work environment based on her race and gender.

10. Sometime after March 31, 2021, Ms. Rivera learned that the basis of the investigation was her alleged violations, during the period October 2020 through March 2021, of Office of Attorney General Criminal Law Division Criminal Investigations Operational Manual Directives 204.4 (Performance of Duty), 204.5 (Competency), 204.8 (Lawful Order), 204.14 (Reporting for Duty), and 204.23 (Reports), and her alleged violation on or about December 15, 2020 of Directives 204.5 (Competency), 204.8 (Lawful Order), 204.23.A (Timely Reports), and 204.23.B (Accurate Reports). However, at no time did Ms. Rivera violate any of those Directives.

11. In or about October 2020, Supervisory Narcotics Agent (SNA) John E. Martinez became Ms. Rivera's immediate supervisor. SNA Martinez is of Argentinian ancestry, while Ms. Rivera is of Puerto Rican ancestry. Prior to SNA Martinez becoming her supervisor, Ms. Rivera never had any work performance issues.

12. SNA Martinez created and perpetuated a hostile work environment based on race and sex, and discriminated against Ms. Rivera because of her race and sex. Agent Rivera dutifully attempted to meet SNA Martinez's expectations, but her actions were constantly criticized and belittled. SNA Martinez treated non-Puerto Rican and male Agents different and better than Agent Rivera. SNA Martinez was unapproachable, and acted as if Agent Rivera's mere presence was bothersome. He also subjected Agent Rivera to inappropriate remarks, and discussed Agent Rivera with her co-workers in a derogatory and demeaning manner. Some examples of SNA Martinez's offensive conduct are set forth below.

13. In or about October 2020, while Agent Rivera was engaged in general conversation with Agent Stacey Rucker, she told Agent Rivera that SNA Martinez asked her if she and Agent Rivera were dating. Agent Rucker also told Agent Rivera that on another occasion, SNA Martinez said to her, "look at Louie trying to fuck Beverly."

14. Agent Rivera had numerous conversations with Agent Rucker about how SNA Martinez made her feel uncomfortable. Agent Rivera even told Agent Rucker that she wanted to transfer to a different squad in order to get away from SNA Martinez.

15. SNA Martinez prevented Agent Rivera from working with other Narcotics Agents. For example, Agent Rivera discussed with SNA Martinez several future investigations that she would have worked on with other agents in the office. Agent Rivera was asked several times by Police Officer Richard Lynch and Police Officer Luis Melendez to work with them on future investigations. SNA Martinez never gave her permission to do so.

16. SNA Martinez blamed Agent Rivera for poor performance by others. For example, in or around January 2021, while taking Officer Lynch to pick up his official vehicle, Agent Rivera told him that it had been very difficult for her to get Agent Ryan Kanyuck to complete required documents related to a December 2020 search warrant. She told Officer Lynch that SNA Martinez blamed her and would not say anything to Agent Kanyuck because they were on the same squad and were good friends.

17. On or about January 5, 2021, Agent Rivera spoke to SNA Martinez about a future investigation she and Officer Melendez already had obtained information about, and about scheduling a surveillance or buy on January 6, 2021. SNA Martinez rejected her request, stating that there was too much other work to do on January 6, 2021. Several days later, Agent Rivera

learned that SNA Martinez had given that case to another agent. Agent Rivera later learned that Officer Melendez had no idea that the case was given to another agent, and that he had told SNA Martinez that he and Agent Rivera would work the case.

18. On January 11, 2021, SNA Martinez summoned Agent Rivera to a meeting with Mr. Haigler and Deputy Attorney General Melissa Francis. When she entered the room, Mr. Haigler told Agent Rivera that the meeting was off the record, that Agent Rivera was not in trouble, and that she was not going to be asked to sign any documents. Mr. Haigler began the meeting by asking Agent Rivera how she thought her performance had been during the past year. Agent Rivera responded, "good," at which point SNA Martinez abruptly interrupted her, stating "I'm not going to sugar coat anything. You have not been doing good on your reports and the last job you did was not good. You fucked up. And you have to admit when you fuck up. I am an old man and I admit when I fuck up. You're always at your computer, what are you doing at your computer?" Agent Rivera replied that she did not understand what he meant, and that she had brought several future investigations to him that she would have liked to work with Officer Melendez, Officer Lynch, and Officer Stephen Dmytryk. SNA Martinez did not initially reply. Mr. Haigler then told Agent Rivera he would like her to mentor with Agent John Gregory from Diversion, her Fraternal Order of Police (FOP) representative, that it was not permanent, and that she was not off the Kensington Initiative. SNA Martinez suggested that Agent Rivera take a report writing class, and then told her, without providing any reason, that she was no longer allowed to work with Officer Melendez on any future investigations.

19. Unlike Agent Rivera, the male NAs that were involved in the investigations were allowed to keep their positions as NAs, continued to work in the office, received no discipline,

and remained members of the FOP. Moreover, Ms. Rivera was denied a promotion to NA2 and a salary increase.

20. In April 2021, defendant participated in an OPR interview regarding a report she had submitted in December 2020.

21. On September 9, 2021, Agent Rivera participated in a pre-disciplinary meeting related to her actions between October 2020 and March 2021, and the December 15, 2020 incident. That same day, Agent Rivera read an OPR interview report in which SNA Martinez referred to her as a "hamster in a wheel."

22. On or about September 16, 2021, Agent Rivera made a formal written complaint to Defendant's Human Resources Department about the discrimination, harassment and retaliation she had been subjected to.

23. On June 10, 2022, Defendant offered Agent Rivera a pre-disciplinary settlement that would have required her: 1) to voluntarily transfer to a Special Agent I classification in the Intelligence Unit, 2) to end her membership in the FOP, 3) to resign her position within six (6) months, 4) to not reapply for employment with the OAG, and 5) to forfeit her right to grieve the action taken.

24. Agent Rivera rejected this pre-disciplinary settlement.

25. On August 16, 2022, Defendant offered Agent Rivera another pre-disciplinary settlement that would have required her: 1) to admit that she violated five OAG Directives, 2) voluntarily transfer to a Special Agent I classification in the Intelligence Unit, 3) to end her membership in the FOP, 4) to resign her position within one (1) year, 4) to not reapply for employment with the OAG, and 5) to forfeit her right to grieve the action taken.

26. Agent Rivera rejected this pre-disciplinary settlement.

27. By letter dated August 30, 2022, defendant terminated Ms. Rivera's employment effective August 30, 2022, allegedly for violating OAG Criminal Law Division Criminal Investigations Operational Manual Directives 204.5, 204.8, 204.23.A, 204.23.B, 204.4, 204.5, 204.8, 204.14, and 204.23. See Exhibit A attached hereto and made a part hereof. Ms. Rivera did not violate any of those Directives.

28. Defendant terminated Ms Rivera because of her race and gender and as a direct and proximate result of the hostile work environment based on race and gender it created, condoned, and perpetuated.

29. Ms. Rivera has suffered, is now suffering and will continue to suffer emotional distress, mental anguish, loss of enjoyment of life and other non-pecuniary losses as a direct and proximate result of defendant's discrimination.

30. Defendant discriminated against Ms. Rivera because of her race and gender and in connection with the hostile work environment based on race and gender it created, condoned, and perpetuated.

31. By reason of defendant's discrimination, Ms. Rivera suffered extreme harm, including loss of income and other employment benefits, loss of professional opportunities, embarrassment and humiliation.

32. Defendant acted and failed to act willfully, maliciously, intentionally and with reckless disregard for Ms. Rivera's rights.

Count I

The Civil Rights Act of 1866, 42 U.S.C. §1981

33. Plaintiff restates and realleges paragraphs 1-32, inclusive, as though set forth here in full.

34. Ms. Rivera had a federal statutory right under the Civil Rights Act of 1866, 42 U.S.C. §1981 (“Section 1981”), as amended, to be accorded the same rights as were enjoyed by White employees with respect to the terms and conditions of their employment relationship with defendant and to the enjoyment of all benefits, privileges, terms and conditions of that relationship.

35. Defendant’s conduct described above deprived Ms. Rivera of the rights, privileges and immunities guaranteed to her under Section 1981.

36. By reason of defendant’s conduct, Ms. Rivera is entitled to all legal and equitable relief available under Section 1981.

Jury Demand

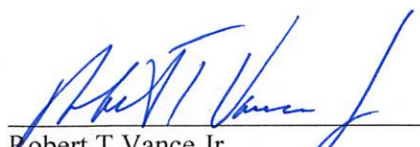
37. Ms. Rivera hereby demands a trial by jury as to all issues so triable.

Prayer for Relief

Wherefore, Plaintiff, Beverly Rivera, respectfully prays that the Court:

- a. adjudge, decree and declare that defendant has engaged in illegal race discrimination, and that the actions and practices of defendant complained of herein are violative of her rights under Section 1981;
- b. order defendant to provide appropriate job relief to Ms. Rivera, including immediate reinstatement;
- c. enter judgment in favor of Ms. Rivera and against defendant for all available remedies and damages under law and equity, including, but not limited to, back pay, front pay, reinstatement, past and future mental anguish and pain and suffering, in amounts to be determined at trial;
- d. order defendant to pay the attorney’s fees, costs, expenses and expert witness fees of Ms. Rivera associated with this case;
- e. grant such other and further legal and equitable relief as may be found appropriate and as the Court may deem just or equitable; and
- f. retain jurisdiction until such time as the Court is satisfied that defendant has remedied the unlawful and illegal practices complained of herein and is determined to be in full

compliance with the law.

A handwritten signature in blue ink, appearing to read "Robert T. Vance Jr.", is positioned above a horizontal line.

Robert T Vance Jr
Law Offices of Robert T Vance Jr
100 South Broad Street - Suite 905
Philadelphia PA 19110
215 557 9550 tel / 215 278 7992 fax
rvance@vancelf.com

Attorney for Beverly Rivera

Exhibit A



JOSH SHAPIRO
ATTORNEY GENERAL

COMMONWEALTH OF PENNSYLVANIA
OFFICE OF ATTORNEY GENERAL
HARRISBURG, PA 17120

16TH FLOOR
STRAWBERRY SQUARE
HARRISBURG, PA
17120
(717) 787-3391

August 30, 2022

Beverly Rivera
Narcotics Agent I
Bureau of Narcotics Investigation
And Drug Control
7801 Essington Avenue
Philadelphia, PA 19153

Dear Ms. Rivera,

Following concerns regarding your work performance and professional conduct, HR met with you and your union representation three times. You attended a pre-disciplinary conference (PDC) on September 9, 2021, where it was alleged that you violated:

- The OAG Criminal Law Division Criminal Investigations Operational Manual Directives:
 - Directive 204.5 Competency
 - Directive 204.8 Lawful Order
 - Directive 204.23.A Timely Reports
 - Directive 204.23.B Accurate Reports

You attended an interview to discuss concerns relating to your job performance on September 16, 2021 and a second PDC meeting on October 28, 2021, where it was alleged that you violated:

- The OAG Criminal Law Division Criminal Investigations Operational Manual Directives:
 - Directive 204.4 Performance of Duty
 - Directive 204.5 Competency
 - Directive 204.8 Lawful Order
 - Directive 204.14 Reporting for Duty
 - Directive 204.23 Reports

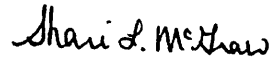
Following these proceedings, OAG found each of the above-referenced allegations to have been sustained. Through your FOP Counsel, you indicated a desire to transfer to another State Agency. We spent several months trying to pursue this option on your behalf, however, the State Agency would not accept your transfer. We initiated negotiations towards a pre-disciplinary settlement. After the final draft of the settlement was sent for your signature, your union representative notified us on August 24, 2022 that you no longer wished to engage in the settlement process.

Your annual performance evaluation, due last fall, was held in abeyance during this time. It is attached, and indicates "Needs Improvement" ratings in every category and an overall rating of Unsatisfactory.

We have exhausted all attempts to resolve this matter. Please be advised that your employment as a Narcotics Agent I is terminated effective close of business, today, August 30, 2022. We will arrange for you to return any OAG property in your possession.

You will receive information separately regarding your benefits.

Sincerely,

A handwritten signature in black ink, appearing to read "Shari L. McGraw".

Shari L. McGraw MBE, SPHR
Director of Human Resources & Office Services
Operations Division

cc: File